

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 5, 2005

Mr. Jason C. Mikaelian, AICP, Associate Planner  
City of Santa Clarita  
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**Comments on Draft Environmental Impact Report Soledad Village (Newhall Land  
and Farming Company), Tentative Tract Map No. 62322  
Master Case 05-044 (SCH No. 2005041100)**

Dear Mr. Mikaelian:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Draft Environmental Impact Report (DEIR) for the proposed Soledad Village located on a 30-acre project site between Soledad Canyon Road and the Santa Clara River. The project consists of a 437-unit residential condominium complex, and 8,000 square foot commercial center, associated private recreational areas, and on-site public and private circulation improvements. Requested entitlements include a zone change from CO-PD (Commercial Office-Planned Development) to RMH-PD (Residential Medium High-Planned Development) and CN-PD (Commercial Neighborhood-Planned Development), an associated General Plan Amendment, a Tentative Tract Map to subdivide the property, and a Conditional Use Permit to exceed a building height of 35 feet.

According to the DEIR, (p. 3-1), the site has been rough graded pursuant to a recorded parcel map to divide the site into six parcels, for which a Mitigated Negative Declaration was prepared. This approval allowed for the following completed improvements: construction of a new street entrance, grading to recompact unconsolidated soils and create site pads above high water flood levels, buried bank stabilization 40 feet wide and 2,600 feet long along the southern bank of the Santa Clara River, and constructing a trail system along the northern and southern site boundary. Of note, in June 2005, the City Council approved the 695-acre Riverpark project directly across the project site along the northern side of the Santa Clara River (DEIR, p. 3-4).

A major objective of the Conservancy is to maintain the full length of the Santa Clara River as a major functioning ecological feature. Part of this objective requires linking upland

buffer areas to the river. The development pattern of the City of Santa Clarita over the past ten years has shown little, if any, propensity for maintaining connections between upland areas within the City core and the Santa Clara River. The Riverpark and Keystone projects are the closest recent examples of this trend. The Conservancy hopes to forge a new direction with this project. Even narrow semi-suburban wildlife corridors provide value for small predators, their prey, as well as people seeking to move from one natural area to another.

The Santa Clara River is one of the most important natural rivers in southern California from a biological value perspective. The project site is located at the narrowest point in the river. The subject project could result in significant adverse biological impacts by constricting the functional width of the Santa Clara River. The river corridor provides contiguous riparian habitat and serves as a conduit for movement for a breadth of threatened and endangered species. An analysis of an aerial photo of the site and surroundings shows that the site is a chokepoint connecting to open space habitat to the south of the Santa Clara River. (Development along Soledad Canyon Road hinders open space connections to the south, just east and west of the project site.) The DEIR is inadequate, in that it provides no analysis of the impacts on wildlife movement in the river corridor and on habitat connectivity to the south.

If the City does not see the light in keeping the Porta Bella area (to the south) ecologically connected to the Santa Clara River, the Conservancy urges the City to at least provide a maximum size buffer along the river for this project.

The DEIR is inadequate in that it does not clearly define the width of the buffer to the Santa Clara River, nor what uses would occur within that "buffer." The DEIR (p. 5.1-33) states "the proposed development would not limit the function of the Santa Clara river as a wildlife corridor, as no development is proposed within the river channel, and the project design provides an adequate setback from the river channel." The DEIR (p. 5.1-33) also states that "...given the nature of the proposed development and the setback distance from the Santa Clara River, the proposed project would not have an adverse effect on riparian habitat within the Santa Clara River channel." This description is insufficient to conclude that there would be no significant impacts to biological resources, including wildlife movement areas and corridors. These conclusions must be backed up with scientific evidence discussing the typical buffer widths needed to maintain the ecological function of the river. The Final Environmental Impact Report (FEIR) must describe the dimensions of the "setback distance" and the uses in this "adequate buffer." The FEIR must state the range of widths of the buffer between the development areas and the river channel and to

the river habitat. Also, the FEIR must define to what extent the fuel modification extends into the river habitat.

The DEIR is inadequate in that it does not clearly define how much undisturbed open space would be protected as a result of this project, nor does it include a figure showing where that open space would be. The DEIR refers to “[a] total of approximately 2.5 acres of open space” (p. 3-7); 12 acres of landscaped/open space area (p. 5.7-33); and development on 70 percent, or 21 acres, of the approximately 30-acre total site area (p. 5.7-40), which seems to imply there would be 9 acres of open space. According to the Site Plan shown on Exhibit 3-3, perhaps the open space is located at the western edge. The DEIR (p. 5.3-14) references an “open space plan,” but provides not details regarding the contents of that plan and when it will be prepared.

The DEIR discussion of lighting impacts and mitigation measures is inadequate. The DEIR (p. 5.3-14) states the project site would not impact the proposed residential uses that would be developed as part of Riverpark because it would be located on a hill and buffered by a distance of at least 100 feet due to the Santa Clara River. What about potentially significant adverse lighting impacts to the *adjacent* river corridor and habitat? The vague language in the mitigation measures for lighting impacts does not address these potentially significant impacts.

We request that you verify the Assessor’s Parcel numbers identified in the Notice of Availability, as they do not appear to match the project boundary shown on Exhibit 3-3. Also, based on our Assessor’s Parcel data provided by the County of Los Angeles and also utilized by the City, it appears that some of the river habitat, possibly composed of Riversidian alluvial fan sage scrub, is included within the site boundary and within the area proposed for development. The FEIR must include an accurate figure with an aerial overlain on the correct parcel boundaries (with each parcel boundary of all parcels for this project shown). The FEIR must include appropriate avoidance and mitigation measures for impacts to this, and any other, sensitive plant community.

### **Need for a Meaningful Environmentally Superior Project Alternative**

The DEIR provides an inadequate range of alternatives, the descriptions of those alternatives are deficient, and the conclusions are unsupported. The DEIR (p. 6-6) states that the “Reduced Density Alternative” with 118 fewer residential units “would result in slightly greater open space acreage.” However, the DEIR does not state how many more acres would be protected and where would those acres be located. The DEIR (p. 6-8)

concludes that this alternative “may not be economically feasible,” with no study to support that conclusion. Similarly, the Work-Live Unit Alternative (with 25 fewer residential units) would result in “greater open space acreage” (p. 6-13), but with no quantification of the acreage, nor description of the location. In these two alternatives, one cannot assess whether the potential impacts to wildlife movement would be reduced, but presumably they would not. (The Existing General Plan Alternative would result in a greater intensity of development.)

The Conservancy recommends that the FEIR include a meaningful alternative that attempts to address the potentially significant impacts to the river wildlife corridor, and to north-south wildlife movement across Soledad Canyon Road to the Porta Bella project area. In this alternative, the project should be limited to 250 feet from the edge of the channel bank stabilization. Grading and improvements should be excluded from this 250-foot-buffer, while trails and native habitat restoration should be permitted. If the DEIR claims that this 250-foot-buffer cannot be provided, there must a scientific justification for a smaller buffer. The buffer should be planted with native plants, and public trails provided. (Although trails have been constructed to the north and south according to the DEIR [p. 3-1], the DEIR [for example, Exhibit 3-3, Soledad Village Site Plan] does not provide a zoomed-in figure clearly depicting the location of those trails on the project site.)

Because the project site is a chokepoint connecting to open space habitat to the south of the Santa Clara River, the Conservancy recommends that the western tip of the project site be avoided. The project and DEIR alternatives should provide a minimum 200-foot-wide wildlife corridor on the site to take advantage of the open space associated with the Metrolink facility, just south of Soledad Canyon Road.

### **Need for Open Space Dedication and Management Funding**

A fee title dedication should also be required of the open space onsite, including along the river buffer area, as described in the proposed alternative above. A fee title dedication should be required to be granted to an appropriate agency capable of managing land for resource protection such as the City of Santa Clarita, Santa Clarita Watershed Recreation and Conservation Authority, or Mountains Recreation and Conservation Authority. All fuel modification zones should also have a conservation easement placed over them to prevent future encroachment. Such easements should be in the favor of both the County and the park agency holding title to the open space. Long-term management funding, in the form of a Community Facilities District, should also be required. This is necessary because this project site is located at a narrow point in the river, and as such, protecting this

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narrow point helps maintain the connectivity along the river.

Long-term management of the open space by the homeowners' association (HOA) does not provide the assurance that the open space will be preserved and managed adequately in perpetuity. Homeowners' associations often have multiple objectives that may conflict with and trump the goal of preservation of the biological resources of the site, and the HOA may not have the expertise (e.g., biological) to manage the site.

In summary, the FEIR must correct those DEIR deficiencies, as described above. A meaningful environmentally superior alternative should be presented in the FEIR, and a permanent open space dedication with associated long-term funding should be required. Please direct any questions and future documentation to Judi Tamasi of our staff at the address on this letterhead or by phone at (310) 589-3200 ext. 121.

Sincerely,

ELIZABETH A. CHEADLE  
Chairperson

cc: State Clearinghouse